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7 *Attorneys for Plaintiff K Mya Mya Min*

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9  
10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**  
12

13 K MYA MYA MIN, individually,

14 Plaintiff,

15 vs.

16 SAM-WILL, INC. a Nevada corporation, d/b/a  
Fremont Hotel and Casino; NEAL JAY  
17 LIPMAN, an individual; DOES I-X; and ROE  
BUSINESS ENTITIES I-X, inclusive,

18 Defendants.  
19

Case No.: 2:17-cv-00625-JCM-PAL

**STIPULATION AND REQUEST TO  
EXTEND DEADLINE FOR SUBMISSION  
OF ENE STATEMENTS**

**(FIRST REQUEST)**

20 Plaintiff K Mya Mya Min (“Plaintiff”), Defendants Sam-Will, Inc. and Neal Jay Lipman  
21 (collectively “Defendants”), by and through their undersigned attorneys of record, hereby stipulate  
22 and request that the deadline for all parties to submit their Early Neutral Evaluation Statements  
23 currently due June 6, 2017, be extended to June 8, 2017. This extension is requested to allow further  
24 time to facilitate settlement discussions. The parties have been engaged in early settlement  
25 negotiations for the last several weeks, and believe they may be close to a resolution of this matter. If  
26 a resolution can be reached this week, it will obviate the need for the ENE session scheduled for June  
27 13, 2017. The parties are setting forth this request in good faith and for the purpose of ensuring the  
28 parties do not incur substantial attorney’s fees associated with the Early Neutral Evaluation Statements

1 while a settlement is legitimately being pursued and may be imminent. Additionally, this request will  
2 not impact the current Early Neutral Evaluation date of June 13, 2017.

3 This is the first request for an extension deadline and is not intended to cause delay or prejudice  
4 to any party.

5 DATED this 5th day of June, 2017.

DATED this 5th day of June, 2017.

6 **MAIER GUTIERREZ & ASSOCIATES**

**CV3 LEGAL**

7  
8 /s/ Danielle J. Barraza

/s/ Charles Vlastic, III

9 JOSEPH A. GUTIERREZ, ESQ.

CHARLES VLASIC, III, ESQ.

10 Nevada Bar No. 9046

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13 8816 Spanish Ridge Avenue

*Attorneys for Defendant Neal Jay Lipman*

14 Las Vegas, Nevada 89148

15 *Attorneys for Plaintiff K Mya Mya Min*

16 DATED this 5th day of June, 2017.

17 **KAMER ZUCKER ABBOTT**

18  
19 /s/ Scott M. Abbott

20 SCOTT M. ABBOTT, ESQ.

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22 KAITLIN H. ZIEGLER, ESQ.

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24 3000 West Charleston Boulevard, Suite 3

25 Las Vegas, Nevada 89102

26 *Attorneys for Defendant Sam-Will, Inc. d/b/a*

27 *Fremont Hotel and Casino*

28 IT IS SO ORDERED;



GEORGE FOLEY, JR.

UNITED STATES MAGISTRATE JUDGE

DATED: June 6, 2017